

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
(Baltimore Division)**

IN RE: SMITH & NEPHEW  
BIRMINGHAM HIP RESURFACING  
(BHR) HIP IMPLANT PRODUCTS  
LIABILITY LITIGATION

MDL No. 2775  
Master Docket No. 1:17-md-2775

JUDGE CATHERINE C. BLAKE

**THIS DOCUMENT RELATES TO  
ALL ACTIONS**

**PARTIES' PROPOSED AGENDA  
FOR AUGUST 29, 2018 STATUS CONFERENCE**

Plaintiffs and Defendant Smith & Nephew, Inc. ("S&N") hereby submit a proposed agenda for the in-person status conference scheduled for August 29, 2018 in Courtroom 7D.

- I. In Chambers Meeting – Scheduled for 9:00 am EST
- II. Open Court Status Conference – Scheduled for 9:30 am EST
  - A. Status of MDL filings
  - B. Status of BHR discovery and deposition limits
  - C. Lexecon deadline and BHR trial planning
  - D. Status of Revised Foreign Data Supplement to Protective Order
  - E. Order Appointing Special Mediator for THA Track
  - F. Coordination and management of THA and R3 cases
  - G. Oral argument on Smith & Nephew, Inc.'s Motion to Dismiss Certain Time-Barred Claims [D.E. 795, 853, and 895]

Dated: August 24, 2018

Respectfully Submitted,

/s/ Robert K. Jenner

Robert K. Jenner, Bar No. 04165  
JENNER LAW  
1829 Reisterstown Road, Suite 350  
Baltimore, Maryland 21208  
rjenner@jennerlawfirm.com  
Phone: 410-413-2155  
Facsimile: 410-982-0122

Jasper D. Ward IV  
JONES WARD PLC  
The Pointe  
1205 E. Washington St., Suite 111  
Louisville, Kentucky 40206  
jasper@jonesward.com  
Phone: (502) 882-6000  
Facsimile: (502) 587-2007

Genevieve M. Zimmerman  
MESHBESHER & SPENCE LTD.  
1616 Park Avenue South  
Minneapolis, MN 55404  
gzimmerman@meshbeshher.com  
Phone: (612) 339-9121  
Facsimile: (612) 339-9188

*Counsel for Plaintiffs*

/s/ Terri S. Reiskin

Sara J. Gourley  
Jana D. Wozniak  
SIDLEY AUSTIN LLP  
One South Dearborn  
Chicago, Illinois 60603  
sgourley@sidley.com  
jwozniak@sidley.com  
Telephone: (312) 853-7000  
Facsimile: (312) 853-7036

Paul J. Zidlicky  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005

pzidlicky@sidley.com  
Tel.: (202) 736-8000  
Fax: (202) 736-8711

James B. Irwin  
Kim E. Moore  
David O'Quinn  
IRWIN FRITCHIE URQUHART &  
MOORE  
400 Poydras St. #2700  
New Orleans, Louisiana 70130  
jirwin@irwinllc.com  
kmoore@irwinllc.com  
doquinn@irwinllc.com  
Telephone: (504) 310-2100  
Facsimile: (504) 310-2101

Terri S. Reiskin, Bar No. 05256  
DYKEMA GOSSETT PLLC  
1301 K Street NW, Suite 1100 West  
Washington, DC 20005  
treiskin@dykema.com  
Telephone: (202) 906-8600  
Fax: (855) 216-7884

*Counsel for Defendant Smith & Nephew,  
Inc.*

**CERTIFICATE OF SERVICE**

I, Jana D. Wozniak, hereby certify that on this 24th day of August 2018, I electronically filed the foregoing with the Court using the CM/ECF system and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Jana D. Wozniak  
*Counsel for Defendant Smith & Nephew,  
Inc.*